

From: [Freeman, Kevin](#)
To: [Winiacki, Eric](#)
Cc: [Fuentes, Rene](#); [MacDonald, Jennifer](#); [Baron, Adam](#)
Subject: RE: CARE Quality Assurance Project Plan (QAPP)
Date: Monday, March 03, 2014 1:23:36 PM

Eric –

ARCADIS has no comments (at this time) related to the Water & Environmental Technologies (WET) Groundwater Monitoring QAPP prepared for CARE. We strongly agree with EPA's specific comments 3 through 12. We hope these will be required to be addressed to EPA's satisfaction prior to accepting the QAPP.

ARCADIS agrees with the request for 14-day notification prior to undertaking any sampling activities. ARCADIS personnel will be present to observe and monitor WET's sampling of YVD and EPA wells. We understand that it is EPA's intention to provide monitoring and observation during sampling activities also. ARCADIS supports this position. Additionally, ARCADIS requests that EPA evaluate the possibility of split-collection for these samples, as allowed under Appendix B, Section III.a.3.d of the CO.

Additionally, ARCADIS call to EPA's attention that additional subsurface investigation activities are currently proposed by CARE (to be executed by WET) at the YVD facilities. Although Appendix B, Section III.a.3.e requires that "All results of measurements, sampling, tests, modeling, or other data (including raw data) generated by Respondents, or on Respondent's behalf, related to this Consent Order and during the period that this Consent Order is in effect, shall be incorporated in the report of the data collection activity or field activity submitted to the EPA." It is the position of the YVD and ARCADIS that any data collected as part of additional investigations is not related to the Consent Order, and therefore will not be incorporated into the CO data set of record.

We appreciate the opportunity to provide a response to this document. Thank you.

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From: Winiacki, Eric [mailto:Winiacki.Eric@epa.gov]
Sent: Friday, February 21, 2014 2:37 PM
To: Freeman, Kevin
Cc: Fuentes, Rene; MacDonald, Jennifer; Baron, Adam
Subject: CARE Quality Assurance Project Plan (QAPP)

Hello Kevin,

Please find attached a QAPP for groundwater monitoring that CARE provided to EPA for EPA review. EPA's comment letter, which has not yet been signed, is also attached. I'm forwarding these to you because there will likely be some need to coordinate regarding access and field presence. Please let me know if you have any concerns about the QAPP or the letter by noon on March 3.

As I mentioned I will be out of the office the week of February 24 and in my absence you

can contact Adam Baron at (206) 553-6361, Baron.Adam@epamail.epa.gov.
Eric

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